From: Scott Couch

To:

**CC:** Billington, Tracie; Jeffrey Albrecht; Shahla

Farahnak;

**Subject:** Re: Monte Rio Sewer System

**Date:** Friday, December 08, 2006 5:01:37 PM

**Attachments:** 

Thank you for your comments. They will be taken into consideration.

Scott B. Couch, P.G. State Water Board - Div. of Financial Assistance 1001 "I" Street, 16th Fl., Sacramento, CA 95814 916-341-5658, scouch@waterboards.ca.gov

>>> "Daniel Wickham"

12/8/2006 4:11 PM >>>

Dear Mr. Couch,

I would like to go on record in opposition to Proposition 50 funding of the proposed Monte Rio sewer plant, as currently envisioned and designed. I have been professionally involved in wastewater treatment as a developer of technology and consultant and designer of wastewater treatment systems with special expertise in on-site, or small community technology. I hold a PhD in Ecology from UC Berkeley and was a research scientist in the UC system for almost 20 years. I own property immediately downstream of the proposed treatment/disposal site for Monte Rio and am very concerned that no study was ever conducted to justify the claim of septic pollution in the river from Monte Rio to my property in Duncans Mills. The EIR prepared for the project specifically states that no pollution can be sited and that the need for the treatment plant is strictly hypothetical.

I conducted surveys of the water course leading to Monte Rio, specifically Dutch Bill Creek, from Occidental, Camp Meeker, Monte Rio and in the Russian River downstream of Monte Rio. I found, using field testing equipment, that there were no instances of observable nitrate in samples immediately

downstream of Camp Meeker, a community served by septics that are even older and more suspect than Monte Rio. Similarly no nitrate could be found in the river just downstream of Monte Rio, nor could it be found in Dutch Bill Creek as it passed through Monte Rio. Further samples taken from seeps in early summer that were clearly below areas of homes with septics also showed non-detectable levels of nitrate. In fact the only measurable nitrogen compound I could find in any sample was a relatively low, approximately 1 mg/l concentration of ammonia, but that was in Dutch Bill Creek, immediately downstream of the pumping station for the Occidental sewer system.

Fecal sampling by the county has never shown any valid documentation of human bacteria in the Monte Rio area. While there have been occasional excursions of fecal concentrations to just slightly over the contact water standard, these are rare and have never risen to the concern that the County Public Health Department ever issued any public notices. Further, the necessary DNA typing of samples in the River to document source has never been done and it is my opinion, as a research ecologist familiar with the fauna of this area of the River, that fecal bacterial sources including raccoons, seals, wading birds, deer, dogs and a wide variety of other organisms are the likeliest source.

My family currently uses and enjoys the Russian River resource downstream of Monte Rio in the knowledge that the upstream homes are not, in fact, polluting the resource. Knowing full well, that most river contamination in the United States is caused by sewered communities, and also knowing that even in the Russian River the only documented cases of pollution are from sewer systems, I am convinced that the proposed sewer plant for Monte Rio will decrease protection of the water resource and not enhance it. As a board member of the Russian Riverkeeper program I am well versed in obtaining the necessary background data to insure that legal recourse will be successful in the almost certain instance of pollution incidents coming from the proposed sewer plant.

More significant, however, is the fact that the County never explored the myriad of on-site and distributed technologies that would have allowed them to develop a system that could serve the downtown core of Monte Rio for a much lower cost, and then to implement a septic management program that

would eliminate the need to build a sewer plant of the scale envisioned. Alternative technologies were never given a chance to enter into the design/bid process and were thus unfairly excluded in what is clearly a restraint of trade at the technology level, if not the individual company level.

Further, the entire process for qualifying Monte Rio for state funds was rife with impropriety and conducted in such fashion to assure that no actual research would be conducted on water quality or evidence of pollution, for fear of negative results.

The State Water Control Board has a plethora of communities with far higher priority than Monte Rio and should summarily disqualify the system that is currently proposed for this community. This is the only method that has any likelihood of moving the County and community to a more cost effective and protective approach to upgrading the Monte Rio downtown. The system as designed is a staggering waste of our financial resources and will do nothing to enhance water quality.

Daniel Wickham, Ph.D.